

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

**INNOVATIVE GLOBAL SYSTEMS,
LLC**

Plaintiff,

V.

**VOLVO CONSTRUCTION
EQUIPMENT NORTH AMERICA,
INC., ET AL.,**

Defendants.

[illegible]

**CIVIL ACTION NO.
6:10-cv-00327 LED**

JURY TRIAL DEMANDED

JOINT MOTION TO EXTEND CERTAIN DEADLINES

Plaintiff, Innovative Global Systems LLC (“IGS”), Volvo Construction Equipment North America, Inc. (“Volvo Construction”), Volvo Trucks North America, Inc. (“Volvo Trucks”) and StarTrak Systems, LLC (“StarTrak”) (collectively referred to herein as “Parties”) jointly file this Unopposed Motion to Extend Certain Deadlines, and in support thereof, show the Court the following:

1. The Court's Docket Control Order of December 21, 2010 set forth certain deadlines, specifically: (1) to comply with P.R. 4-3 (Joint Claim Construction and Prehearing Statement), (2) to exchange privilege logs, (3) to advise the Court regarding proposed technical advisors, (4) to submit tutorials, and (5) to comply with P.R. 4-5(a) (Opening Claim Construction Brief).
2. Pursuant to the Court's Order on the prior Joint Motion to Extend Certain Deadlines (Dkt. No. 213), the deadline for the parties to comply with P.R. 4-3, exchange privilege logs, advise the Court regarding proposed technical advisors, submit tutorials, and comply with P.R. 4-5(a) is currently July 22, 2011.

3. The only three remaining defendants of the initial twelve in this case are Volvo Construction, Volvo Trucks, and StarTrak.
4. The Parties have formalized an agreement to resolve the case and are in the process of executing its terms so that a stipulated motion to dismiss can be filed.
5. Therefore, the Parties request an additional extension until August 1, 2011 to comply with P.R. 4-3, exchange privilege logs, advise the Court regarding proposed technical advisors, submit tutorials, and comply with P.R. 4-5(a).
6. The extension is not sought for delay and such an extension will allow the Parties to finalize their settlement agreements.

WHEREFORE, IGS, Volvo Construction, Volvo Trucks, and StarTrak respectfully request the Court enter an order granting an extension of the above deadlines until August 1, 2011.

DATED: July 22, 2011

Respectfully submitted,

/s/ Keith A. Rutherford

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/s/ Aaron M. Levine with permission

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CERTIFICATE OF SERVICE

I hereby certify that counsel of record who are deemed to have consented to electronic service are being served today, July 22, 2011 with a copy of the foregoing **JOINT MOTION TO EXTEND CERTAIN DEADLINES** via the Court's CM/ECF system per Local Rule CV-5(a)(3). Any other counsel of record will be served by electronic mail, facsimile transmission and/or first class mail on this same date.

/s/ Sarah R. Cabello